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APPLICATION OF SOUTHWESTERN §
ELECTRIC POWER COMPANY FOR §
CERTIFICATE OF CONVENIENCE § BEFORE THE STATE OFFICE
AND NECESSITY AUTHORIZATION § OF
AND RELATED RELIEF FOR THE § ADMINISTRATIVE HEARINGS
ACQUISITION OF WIND GENERATION §
FACILITIES §

**MOTION TO INTERVENE OF THE
CITIES ADVOCATING REASONABLE DEREGULATION**

Pursuant to 16 Tex. Admin. Code § 22.104 (TAC) the Cities Advocating Reasonable Deregulation¹ (CARD) file their motion to intervene, and in support thereof shows as follows:

1. CARD is a coalition of municipalities located in the service territory of Southwestern Electric Power Company (SWEPCO). CARD was formed to address the municipalities' concerns with, and interest in, utility rates, services, and operations. CARD, its residents, and businesses located within city limits may be adversely impacted by the outcome of this proceeding.
2. CARD consists of municipalities with standing to participate in this proceeding pursuant to the Public Utility Regulatory Act ("PURA"), TEX. UTIL. CODE ANN. § 33.025 and 16 TAC § 22.103(b). CARD hereby requests that the Commission and all parties to this proceeding serve copies of all filings and submissions, whether notices, correspondence, pleadings, briefs or other documents upon the CARD's designated representatives.

¹ In prior proceedings, CARD has included the Cities of Atlanta, Alba, Avery, Carthage, Center, Clarksville City, Daingerfield, Dekalb, Gladewater, Grand Saline, Hallsville, Hawkins, Henderson, Hughes Springs, Jefferson, Kilgore, Lakeport, Linden, Longview, Marshall, Mineola, Mt. Enterprise, Mt. Pleasant, Mt. Vernon, Naples, Nash, New Boston, New London, Pittsburg, Queen City, Tatum, Tenaha, Texarkana, Waskom, White Oak, Winona, and Winsboro. CARD will modify its list of member cities in future filings as necessary.

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3. CARD's authorized representatives in this matter are:

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4. The Commission has jurisdiction over the parties and subject matter of this intervention pursuant to Chapters 33 and 36 of the Public Utility Regulatory Act ("PURA" or the "Act") as well as other provisions of the Act.

WHEREFORE, CARD respectfully requests the entry of an order granting CARD leave to intervene as a party.

Respectfully submitted,

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By: 

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**ATTORNEYS FOR CITIES ADVOCATING
REASONABLE DEREGULATION**

CERTIFICATE OF SERVICE

I hereby certify that on this the 27th day of August 2019, a true and correct copy of the ***Motion to Intervene of the Cities Advocating Reasonable Deregulation*** was served upon all parties of record by facsimile and/or First-class mail United States mail, postage paid.

By: 

Leslie Lindsey